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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

ANDREW L. COLBORN,)
Plaintiff,) Case No.
vs.) 19-cv-0484
NETFLIX, INC., et al.,)
Defendants.)

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VIDEOTAPED DEPOSITION OF ADAM DEL DEO
April 26, 2022

REPORTED REMOTELY BY:
AMBER S. WILLIAMS, C.S.R. No. 1080
Notary public



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1 through NFX 1941, you can take a moment and look
2 through those, please.

3 A. Okay.

4 Q. So the documents at NFXCOL 1933 through
5 1941 are the "Making a Murderer" notes for Episodes
6 1, 2, 3, and 4, as referenced in the preceding e-mail
7 message, correct?

8 A. That looks correct.

9 Q. And to your understanding, in the "To"
10 line on page NFXCOL 1933, when it refers to "Making a
11 Murderer Creative," who all is included in that?

12 A. I don't know. It depends on -- it
13 looks, based on the e-mail, that the cover letter --
14 that it would have been Lisa Nishimura, myself, and
15 Marjon at that time.

16 Q. With respect to the notes that are
17 represented by NFXCOL 1933 through 1941, was -- do
18 you know specifically who drafted each note other
19 than looking at other documents or is this a group
20 effort?

21 A. I don't recall.

22 Q. Did you at the time review the notes
23 that are represented at NFXCOL 1933 through 1941?

24 A. I don't recall.

25 Q. Normally in your work on the series, you

1 wouldn't have ignored the notes for those four
2 episodes, would you?

3 A. I normally would not have ignored notes.

4 Q. All right. So in your normal practice,
5 you would have reviewed those notes, correct?

6 A. That's correct.

7 Q. Okay. Directing your attention forward
8 in the document to -- marked as Exhibit 5, to the
9 page Bates-stamped NFXCOL 1942 in the lower
10 right-hand corner.

11 A. Okay.

12 Q. In that document is a copy of an e-mail
13 message from Lisa Nishimura to Moira Demos and Laura
14 Ricciardi and Lisa Dennis on which you are copied; is
15 that correct?

16 A. That looks to be the case.

17 Q. And that e-mail message forwarded notes
18 for discussions on Version 2 of the pilot for MAM; is
19 that correct?

20 A. That looks to be the case.

21 Q. And then directing your attention to
22 NFXCOL 1943 through NFXCOL 1947, you can take a
23 moment and just scan through those, please.

24 A. Okay.

25 Q. The documents at NFXCOL 1943 through

1 correct?

2 A. It would have -- yeah, based on what I'm
3 looking at here, I don't recall this e-mail and I
4 don't recall reviewing these notes. In the course of
5 my position, which we talked about earlier, I
6 generally would have looked at notes before they went
7 out.

8 Q. Moving forward in Exhibit 6 to the
9 documents that -- two forward from where we were, or
10 left off, the document Bates-stamped NFXCOL 1948, can
11 you see that document?

12 A. 19- --

13 Q. -- -48.

14 A. Yeah. So we went through this. Okay.
15 Yeah.

16 Q. And again, that -- that document is a
17 message -- or, copy of an e-mail message from Marjon
18 Javadi to Laura Ricciardi, Mary Manhardt, and Lisa
19 Dennis that is copied to you and Lisa Nishimura?

20 A. That is correct.

21 Q. And that e-mail message references
22 attached notes for Episode 6, correct?

23 A. That looks correct.

24 Q. And the attachment line at the top of
25 the document where -- just underneath the subject,

1 "subjects"; is that right?

2 A. The pool -- I think the pool hall
3 patrons, yeah, I think we are using that as a
4 synonym.

5 Q. Okay. Do you -- did you know the
6 identities of any of those people at any time?

7 A. I don't recall that.

8 Q. Do you know how those people were
9 solicited for participation?

10 A. I do not.

11 Q. Do you know whether any of those people
12 had any connections to the Averys?

13 A. I do not.

14 Q. Do you know whether any of them have had
15 any law enforcement encounters with Manitowoc County?

16 A. I do not.

17 MS. BARKER: Okay. Do we want to try to do
18 the rough edition?

19 MS. BURSIK: Sure.

20 MS. BARKER: Okay. So despite our AV issues,
21 we're going to try to play some raw footage. We
22 probably -- I'm assuming Leita wants to put a
23 statement -- or, I'm sorry -- Attorney Walker
24 probably wants to put a statement on the record. I
25 was going to play just a few excerpts of raw footage